

### **REMARKS/ARGUMENTS**

The present application was originally filed with claims 1-52. By a prior Amendment, the Applicant canceled claims 1-52, without prejudice or disclaimer, and added new claims 53-90. By the present Amendment, claim 58 is amended. In addition, claims 72-90 are withdrawn in response to a Restriction Requirement by the Examiner and pending the filing of one or more continuing applications. Accordingly, claims 53-71 are presently under review, and reconsideration of these claims is respectfully requested.

#### **I. RESTRICTION REQUIREMENT**

The Examiner has restricted pending claims 53-90 into the following two Groups:

- Group I – claims 53-71, drawn to a method; and
- Group II – claims 72-90, drawn to a database host.

The Applicant hereby elects Group I, claims 53-71, without traverse, and has therefore withdrawn Group II, claims 72-90.

#### **II. REJECTIONS UNDER 35 U.S.C. §112**

The Examiner has rejected claim 58 under 35 U.S.C. §112, second paragraph, as allegedly containing an "ownership limitation," therefore rendering the claim indefinite. While the Applicant may not necessarily agree with the Examiner's assertion, claim 58 has been amended to remove the referenced term "third party." Accordingly, it is believed this rejection has been overcome, and the Applicant therefore respectfully requests that it be withdrawn.

#### **III. REJECTIONS UNDER 35 U.S.C. §102**

The Examiner has rejected claims 53-55 and 57-71 under 35 U.S.C. §102(e) as allegedly anticipated by U.S. Patent Application 2001/0042010 to Hassell. In response, however, the

Applicant respectfully asserts that Hassell does not disclose all of the elements of independent claim 53, and its dependent claims. In addition, the Applicant notes that Hassell is not prior art to the present claims.

More specifically, the Applicant notes that the present application has an earlier date of conception and reduction to practice than the earliest listed priority date of the Hassell reference. Hassell claims priority to U.S. Provisional Patent Application No. 60/168,977, which has a filing date of December 3, 1999. However, the present application claims priority to U.S. Provisional Patent Application No. 60/142,611, which has a filing date of July 7, 1999, and which discloses the subject matter of claims 53-71 of the present application. As a result, the Hassell reference is not considered prior art to the present application, and thus cannot be used to maintain a rejection of the claims of the present application under 35 U.S.C. §102(e).

In addition, the Applicant respectfully asserts that Hassell does not disclose each and every element of independent claim 53. Among other things, independent claim 53 recites receiving first and second virtual documents from different first and second corresponding document sources. In contrast, Hassell does not disclose receiving first and second virtual documents *from different document sources*. Instead, Hassell stores all coupons provided to its users on a single source:

[0057] Although *appearing* to be resident on a host site, in a folio or being transferable, *a coupon actually resides in the server system* in that information necessary for use, transfer, duplication, forgery or reuse prevention, authentication, and transfer history are user inaccessible. This has several advantages. Since a user never has access to information which would allow duplication or forgery of a coupon, the risk of duplication or forgery is low.

Hassell, ¶0057 (emphasis added). Based on the above passage, Hassell even cautions against the idea of coupons being resident in other document sources, and then later sent to the coupon system if selected. Hassell's caution is understandable due to fraud prevention reasons; however, the present application, along with the family of applications related to the present application, includes techniques for fraud prevention when documents originate from external sources. As a result, even if Hassell were found to be prior art to the present application and claims, Hassell does not anticipate independent claim 53 since it does not disclose the receiving of documents from different document sources.

For at least these reasons, Hassell is neither prior art to the present application, nor does it anticipate independent claim 53. Thus, Hassell does not anticipate claim 53 nor the claims dependent thereon. Accordingly, the Applicants respectfully request that the Examiner withdraw the rejection of the present claims based on Hassell.

#### **IV. REJECTIONS UNDER 35 U.S.C. §103**

The Examiner has also rejected dependent claim 56 under 35 U.S.C. §103(a) as allegedly obvious and thus unpatentable over Hassell. As mentioned above, however, Hassell is not considered prior art to the present application, and does not teach or suggest all of the elements of independent claim 53. Therefore, Hassell also cannot be prior art to dependent claim 56, nor can it teach or suggest all of the elements of this claim. Accordingly, the Applicants respectfully request that the Examiner withdraw the rejection of this dependent claim as well.

#### **V. CONCLUSION**

The Applicant submits that claims 53-71 are allowable, and therefore a Notice of Allowability is respectfully requested. The Examiner is requested to contact the Attorney of Record in needed to expedite prosecution of the present application, or to discuss any of the

above arguments in further detail.

The three-month response deadline for the pending Office Action is March 28, 2008; thus, no fee is believed due with this filing. If fees are due, the Director is hereby authorized to charge Deposit Account No. 13-0480 for any such fees, referencing the Attorney Docket Number specified herein. In addition, the Applicant notes that this response is being filed within the two-month deadline for filing a response; thus, this Amendment is within the two-month shortened period for response under M.P.E.P. 706.07(f).

Respectfully submitted,

/James H. Ortega/

Date: February 28, 2008

---

James H. Ortega, Reg. No. 50,554

**BAKER & MCKENZIE LLP**

2001 Ross Avenue, Suite 2300

Dallas, TX 75201

Tel: (214) 978-3058